

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON SEPTEMBER  
11, 2001

Case No. 1:03-md-01570-GBD-SN

*This document relates to:*

*Ashton et al. v. Al Qaeda, and the Republic of Sudan et al.*, Case No. 02 Civ. 6977; *Nolan et al. v. Republic of the Sudan*, Case No. 20 Civ. 10720; *Parker et al. v. Republic of the Sudan*, Case No. 20 Civ. 10657; *Betru et al. v. The Republic of Sudan*, Case No. 20 Civ. 10615; *Clarke et al. v. The Republic of the Sudan*, Case No. 23 Civ. 07736; *Burnett et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849; *Federal Insurance Co., et al. v. Al Qaida, et al.*, Case No. 03 Civ. 6978; *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970; *Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, Case No. 04 Civ. 1922; *Estate of John P. O'Neill, Sr., et al. v. Republic of the Sudan, et al.*, Case No. 18 Civ. 12114; *DeRubbio, et al. v. Islamic Republic of Iran*, Case No. 18 Civ. 05306; *Morris, et al. v. Islamic Republic of Iran*, Case No. 18 Civ. 05321; *Bernaerts, et al. v. Islamic Republic of Iran*, Case No. 19 Civ. 11865; *Aronow v. Republic of Sudan*, Case No. 20-cv-7733; *King, et al. v. Islamic Republic of Iran*, Case No. 22 Civ. 05193; *Strauss v. Islamic Republic of Iran*, Case No. 22 Civ 10823; *Perry et al. v. Republic of the Sudan*, Case No. 23 Civ. 07391; *DiNardo et al. v. Republic of the Sudan*, Case No. 23 Civ. 07328; *Adler et al. v. Republic of Sudan*, Case No. 23 Civ. 07164; *Fennelly, et al. v. Islamic Republic of Iran*, Case No. 23 Civ. 10824; *Kone, et al. v. Islamic Republic of Iran*, Case No. 23 Civ. 05790; *Kelly, et al. v. Islamic Republic of Iran, et al.*, Case No. 23 Civ. 7283; *Lopez, et al. v. Islamic Republic of Iran, et al.*, Case No. 23 Civ. 08305; *Jelnek, et al. v. Islamic Republic of Iran*, Case No. 24 Civ. 05520; *Lum, et al. v. Islamic Republic of Iran*, Case No. 24 Civ. 07824.

**SUDAN'S NOTICE OF MOTION FOR CERTIFICATION  
OF AN INTERLOCUTORY APPEAL PURSUANT TO 28 U.S.C. § 1292(b)**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1292(b) and Local Civil Rule 7.1, the Republic of the Sudan ("Sudan"), by and through undersigned counsel, hereby appears for the purpose of moving the Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order certifying the Court's Memorandum Decision and Order dated August 10, 2023 (ECF No. 9278)

for interlocutory appeal pursuant to 28 U.S.C. § 1292(b). A memorandum of law in support of this Motion is filed herewith.

Dated: January 29, 2025  
Washington, DC

Respectfully submitted,

**WHITE & CASE**

/s/ Christopher M. Curran

Christopher M. Curran

Nicole Erb

Claire A. DeLelle

Nicolle Kownacki (*pro hac vice*)

Celia A. McLaughlin

701 Thirteenth Street, NW

Washington, DC 20005

Telephone: + 1 202 626 3600

Facsimile: + 1 202 639 9355

ccurran@whitecase.com

nerb@whitecase.com

cdelelle@whitecase.com

nkownacki@whitecase.com

cmclaughlin@whitecase.com

*Counsel for the Republic of the Sudan*